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Attorneys for Liberty Utilities (Litchfield Park Water & Sewer) Corp.

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION
OF LIBERTY UTILITIES (LITCHFIELD
PARK WATER & SEWER) CORP. FOR
APPROVAL OF AN EXTENSION OF A
CERTIFICATE OF CONVENIENCE AND
NECESSITY TO PROVIDE WASTEWATER
UTILITY SERVICE IN MARICOPA
COUNTY, ARIZONA.

DOCKET NO: SW-01428A-15-0259

**REQUEST FOR EXTENSION OF
HEARING DATE AND FOR
MODIFICATION OF NOTICE
REQUIREMENT**

Liberty Utilities (Litchfield Park Water & Sewer) Corp. (the "Company") hereby submits this Request for Extension of Hearing Date and for Modification of Notice Requirement in the above-captioned matter.

The hearing is currently set for March 8, 2016.¹ However, both of the attorneys for the Company in this matter (as listed in the pleadings) are unavailable on that date. Therefore, the Company respectfully requests the resetting of the hearing to a date and time convenient for the Administrative Law Judge falling on or after April 1, 2016.²

¹ Procedural Order (January 12, 2016) at 2:2-4.

² In the month of April, the weeks of April 18 and April 25 work best for the Company and Staff with the exception of April 27-29, 2016. Also of note is that the Commission's April Open Meeting is scheduled for April 12 and 13, 2016.

1 The Company has also been ordered to both mail and publish notice by
2 February 3.³ Respectfully, the Company does not believe that publication is necessary
3 given that the sole property owner in the extension area is Maricopa County Municipal
4 Water Conservation District Number One ("MWD"), and MWD will be receiving notice
5 via mail. However, if publication is to be required, the Company requests that it be given
6 a new date for publication, as well as notice by mail, consistent with the requested change
7 in the hearing date.

8 Counsel for the Company has conferred with counsel for the other parties, and
9 Staff does not oppose the Company's requests contained herein. The attorney for the
10 intervenor/landowner was unable to obtain consent from her client and due to the pending
11 notice deadline, the Company felt that this pleading had to be filed immediately.

12 RESPECTFULLY SUBMITTED this 25th day of January, 2016.

13 SHAPIRO LAW FIRM, P.C.

14
15 By: _____

16 Jay L. Shapiro
17 1819 E. Morten Avenue, Suite 280
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18 and

19 LIBERTY UTILITIES

20 Todd C. Wiley
21 Assistant General Counsel
22 12725 W. Indian School Road, Suite D-101
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23 Attorneys for Liberty Utilities (Litchfield Park
24 Water & Sewer) Corp.

25
26 ³ Procedural Order at 4:1-4.

1 **ORIGINAL** and thirteen (13) copies
2 of the foregoing filed
3 this 25th day of January, 2016, with:

4 Docket Control
5 Arizona Corporation Commission
6 1200 W. Washington Street
7 Phoenix, AZ 85007

8 **COPY** of the foregoing hand-delivered
9 this 25th day of January, 2016, to:

10 Sasha Paternoster, ALJ
11 Hearing Division
12 Arizona Corporation Commission
13 1200 W. Washington Street
14 Phoenix, AZ 85007

15 **COPY** of the foregoing emailed & hand-delivered
16 this 25th day of January, 2016, to:

17 Robin Mitchell
18 Legal Division
19 Arizona Corporation Commission
20 1200 W. Washington Street
21 Phoenix, AZ 85007
22 rmittchell@azcc.gov

23 **COPY** of the foregoing emailed & mailed
24 this 25th day of January, 2016, to:

25 Michele Van Quathem
26 Ryley Carlock & Applewhite
One North Central Avenue, Suite 1200
Phoenix, AZ 85004
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By: Whitney Birk